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May 15, 2008

VIA FACSIMILE 212-805-7906

Honorable Denny Chin
 United States Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: Geltzer v. Altman et al., 07 CV 7852(DC)

Dear Judge Chin:

We represent Robert L. Geltzer, the Chapter 7 Trustee (the "Trustee") of the Debtor 1st Rochdale Cooperative Group, Ltd (the "Debtor"), and the Plaintiff in an adversary proceeding originally commenced in the Bankruptcy Court for the Southern District of New York, styled Robert L. Geltzer, as Chapter 7 Trustee of 1st Rochdale Cooperative Group Ltd. v. Gary Altman, Rhoda Brown, "John Doe 1" as Executor or Administrator of the Estate of George Crethan, Saul Mildworm, Jack Raskin, David Smith, "John Doe 2" as Executor or Administrator of the Estate of Allen Thurgood, Edward Yaker, Gregory Wortham and David L. Johnson, for breach of fiduciary duty and avoidance of fraudulent conveyances against certain of the defendants.

As previously reported to Your Honor, the Trustee has reached a settlement with Defendants Gary Altman, Rhoda Brown, the Estate of George Crethan, Saul Mildworm, Jack Raskin, David Smith, and Edward Yaker, all former directors of the Debtor (the "Former Directors Settlement") and a separate settlement with Defendant David Johnson (the "Johnson Settlement") (collectively the "Settlements"). With respect to the Settlements, the Trustee has received settlement payments and all parties have signed the settlement agreements.

The Trustee is in the process of drafting a motion pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure to have the Settlements approved by this Court (the "9019 Motions"). It is anticipated that the 9019 Motions will be filed next week. Your Honor had originally set May 20, 2008, as the date by which settlement papers with respect to the Former Directors' Settlement needed to be

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filed. We respectfully request that your Honor extend that date until May 24, 2008, in order to allow the Trustee sufficient time to file and serve the aforementioned settlement papers on all creditors, as required by the Federal Rules of Bankruptcy Procedure.

In addition, I am writing Your Honor to request permission to waive and dispense with the requirements set forth in Rule 7.1(a) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York which require that any motion filed shall have an accompanying memorandum of law. The 9019 Motions do not present any novel issues of law, and moreover, included in the Applications, in support of the 9019 Motions, is the law upon which the Trustee relies. Accordingly, it respectfully submitted that a waiver of the Local Rule 7.1(a) requirement is appropriate under the circumstances.

Therefore, on behalf of the Trustee, I respectfully request that Your Honor (i) extend the time by which the settlement papers be filed to May 24, 2008; and (ii) waive the requirement that a separate memorandum of law be filed with the Settlement Motions.

If you have any questions, please feel free to contact me.

Respectfully,


Andrea K. Fisher

AKF

cc: Barry Lichtenberg, Esq.

Both requests
are approved.
SO ORDERED.



WBS

5/16/08